

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MONICA RAMIREZ, individually and on
behalf of other persons similarly situated who
were employed by OSCAR DE LA RENTA,
LLC, or any other entities affiliated with or
controlled by OSCAR DE LA RENTA, LLC,

Plaintiffs,

-against-

OSCAR DE LA RENTA , LLC, or any other
entities affiliated with or controlled by OSCAR
DE LA RENTA, LLC,

Defendant.

Civil Action No.: 1:16 CV 07855 (RA)(DCF)


ECF CASE

I, Valentina Santos, hereby depose and state:

1. I am the Showroom Assistant and Intern Coordinator for Oscar de la Renta ("ODLR"). I make this declaration on personal knowledge, and upon information and knowledge I obtained through reviewing documents.
2. ODLR does not regularly, or consistently, maintain records concerning the residence of interns. ODLR does, however, possess residence information (obtained from resumes and contact sheets) concerning individuals who interned, or are currently interning, in 2016.
3. Based upon a review of the information within ODLR's possession, ODLR had approximately 72 interns in 2016. For five of these individuals, ODLR does not have residence information. Of the remaining 67 interns, 30 individuals provided an out-of-state permanent residence address and none provided a Delaware residence.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
November 21, 2016



Valentina Santos
Showroom Assistant/Intern Coordinator